REMARKS/ARGUMENTS

Claims 52-110 are now currently pending in this application. Claims 52, 56, 63, 65, 66, and 77-79 have been amended. Claim 1 has been canceled. Claims 80-110 have been added. In view of the above amendments and remarks that follow, reconsideration, reexamination, and an early indication of allowance of claims 52-110 are respectfully requested.

FIG. 2D has been amended to correct a typographical error. No new matter has been added. Entry of the amendment is respectfully requested.

Claim 1 is rejected because it is identical to claim 1 of Application No. 09/694,079. Claim 1 is also rejected under 35 U.S.C. 103(a) as being unpatentable over Hidary et al. (U.S. Patent No. 5,774,664). Claim 1 of the present application has been canceled for pursuing in Application No. 09/694,079. Withdrawal of the rejection is therefore respectfully requested.

The Examiner objects to claims 56, 63, and 77 for lacking sufficient antecedent basis for certain limitations in the claims. Claims 56, 63, and 77 have been amended to correct the antecedent basis. The amendment was made for reasons unrelated to patentability. Withdrawal of the objection is respectfully requested.

Claims 52-79 are rejected under 35 U.S.C. 101 because the claimed invention is allegedly directed to non-statutory subject matter. Independent claim 52 and has been amended so that it is now directed to "a computer-readable medium," which is statutory subject matter. Claim 66 has also been amended to recite "[a] method for generating one or more data structures via a first

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processor . . ., the one or more data structures being stored in a computer-readable medium for access by an application program executed by a second processor in the hyperlinked video signal annotation data system."   Accordingly, withdrawal of the rejection of claims 52-79 under 35 U.S.C. 101 is respectfully requested.

Claims 52, 53, 55, 56, 64-67, 69, 70, 78, and 79 are rejected under 35 U.S.C. 102(e) as being anticipated by Kaiser et al. (U.S. Patent No. 6,615,408).   Applicant respectfully traverses this rejection.

The Examiner contends that Kaiser's placement zone corresponds to the recited "first annotation data structure element" and Kaiser's trigger zone corresponds to the recited "second annotation data structure element."   Applicant respectfully disagrees.   Both the placement and trigger zones disclosed in Kaiser are merely temporal portions of a video signal, and do not correspond to an "annotation data structure element" as is recited in claim 52.   (See, Col. 6, lines 18-20; FIG. 2).

Assuming, *arguendo*, that Kaiser's placement zone corresponds to the first annotation data structure and the trigger zone corresponds to the second annotation data structure, the placement zone must include both "an object reference for an object in a video frame and a corresponding first identifier" where "a second annotation data structure element," that is, the trigger zone, is "identified by said first identifier."   (Emphasis added).   The Examiner contends that "Kaiser discloses that the image area (described using a

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placement zone) is referenced by some form of an identifier in order to link actions to the image." However, the identifier disclosed in Kaiser to link actions to the image are triggers that are embedded in trigger zones, and not in placement zones. Any other identifier that may be used to reference the image area is not also used to identify a trigger zone which is contended to correspond to the recited second annotation data structure element. Accordingly, Applicant submits that claim 52 is now in condition for allowance.

Claim 66 includes limitations that are similar to the limitations recited in claim 52 which make claim 52 allowable, and is therefore also submitted as being in condition for allowance.

Claims 54, 57-63, 68, and 71-77 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kaiser alone, or over Kaiser in combination with Moriyama et al. (U.S. Patent No. 5,889,746) or Blackketer et al. (U.S. Patent No. 6,415,438). Applicant submits that claims 54, 57-63, 68, and 71-77 are in condition for allowance because they depend on an allowable based claim, and for the additional limitations that they contain.

Claims 80-110 are new in this application. Claims 80-94 are in condition for allowance because they depend directly or indirectly on allowable claim 52, and for the additional limitations contained therein.

Claim 95 recites "[a] method for generating one or more data structures . . . comprising: identifying a region of a video frame associated with an object included in the video
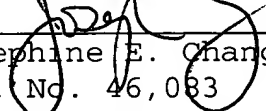
frame; selecting a value for the identified region; creating a first data structure mapping the selected value to a plurality of pixels in the identified region, the first data structure further storing a first reference pointer; creating a second data structure identified by the first reference pointer, the second data structure associating the value to a first identifier; and creating a third data structure identified by the first identifier, the third data structure including a first set of annotation data references for the object." None of the cited references teach or suggest these limitations. Accordingly, claim 95 is submitted as being in condition for allowance.

Claims 96-110 are also submitted as being in condition for allowance because they depend directly or indirectly upon allowable claim 95, and for the additional limitations contained therein.

In view of the above amendments and remarks, Applicant respectfully requests an early indication of allowance of claims 52-110.

Respectfully submitted,

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